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*Lead and Liaison Counsel for
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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

IN RE STATIC RANDOM ACCESS
 MEMORY (SRAM) ANTITRUST
 LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

This Document Relates to:
 ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND ORDER
 EXTENDING TIME FOR DEFENDANTS
 TO RESPOND TO INDIRECT
 PURCHASER PLAINTIFFS' PROPOSED
 FORMS OF NOTICE OF CLASS
 ACTION AND PARTIAL
 SETTLEMENTS**

WHEREAS, on November 25, 2009, the Court issued an Order Granting Indirect Purchaser Plaintiffs' Motion for Class Certification and Denying Motions to Exclude Expert Opinions (Dkt. 903) ("Order Granting Certification"), wherein the Court certified a nationwide injunctive class of indirect purchasers of SRAM pursuant to Federal Rules of Civil Procedure 23(a) and (b)(2), as well as twenty-seven (27) state classes of indirect purchasers of SRAM seeking damages and/or restitution under Federal Rules of Civil Procedure 23(a) and (b)(3); and

WHEREAS, within thirty days of the Order Granting Certification, Class Counsel for Indirect Purchaser ("IP") Plaintiffs were required to prepare and submit a proposed form of notice to be sent to members of the Class, and Defendants were permitted to file any comments to that notice

1 within fifteen days thereafter; and

2 WHEREAS, on December 9, 2009, Defendants NEC, Samsung and Cypress filed a petition,
3 pursuant to Federal Rule of Civil Procedure 23(f), in the United States Court of Appeals for the
4 Ninth Circuit for permission to appeal the Court's Order Granting Certification (the "Petition"); and

5 WHEREAS, the parties stipulated and the Court ordered the notice hearing vacated until the
6 Ninth Circuit ruled on the Petition (*see* Dkt. 907); and

7 WHEREAS, pursuant to the stipulation, IP Plaintiffs were required to submit to the Court a
8 proposed form of notice to be sent to class members within 30 days from the date of the Ninth
9 Circuit's decision regarding the Petition; and

10 WHEREAS, on February 10, 2010, the Ninth Circuit denied the Petition; and

11 WHEREAS, on March 12, 2010, IP Plaintiffs filed Proposed Forms of Notice Regarding
12 Class Action and Partial Settlements (Dkt. 971) (the "Proposed Forms of Notice"); and

13 WHEREAS, Defendants are required to respond to IP Plaintiffs' Proposed Forms of Notice,
14 if at all, by March 26, 2010; and

15 WHEREAS, IP Plaintiffs are currently discussing the Proposed Forms of Notice with the
16 non-settling Defendants, Cypress and Samsung (the "Non-Settling Defendants") in an attempt to
17 informally resolve issues and concerns raised by the Non-Settling Defendants, and the parties require
18 more time to consider and discuss these issues;

19 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the
20 parties identified below, and subject to the Court's approval, that:

21 Defendants shall have until April 2, 2010 to respond to IP Plaintiffs' Proposed Forms of
22 Notice.

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Dated: March 25, 2010

By: /s/ Christopher T. Micheletti

**CHRISTOPHER T. MICHELETTI
ZELLE HOFMANN VOELBEL
& MASON LLP**

*Lead and Liaison Counsel for Indirect-
Purchaser Class*

Dated: March 25, 2010

By: /s/ Michael W. Scarborough

**MICHAEL W. SCARBOROUGH
SHEPPARD MULLIN RICHTER &
HAMPTON LLP**

*Attorney for Defendants
Samsung Electronics Company, Ltd.,
Samsung Semiconductor, Inc. and
Samsung Electronics America, Inc.*

Dated: March 25, 2010

By: /s/ Gary A. Winters

**GARY A. WINTERS
MAYER BROWN LLP**

*Attorney for Defendant
Cypress Semiconductor Corporation*

Additional Defendants and Counsel:

By /s/ Belinda Lee

**BELINDA LEE
LATHAM & WATKINS LLP**

*Attorney for Defendants
Toshiba Corporation and Toshiba
America Electronic Components, Inc.*

By /s/ Matthew S. Leddicotte

**MATTHEW S. LEDDICOTTE (pro hac vice)
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*Attorney for Defendants
Etron Technology Corporation and Etron
Technology America, Inc.*

By /s/ Joshua D. N. Hess

**JOSHUA D. N. HESS
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*Attorney for Defendants
Micron Technology, Inc. and Micron
Semiconductor Products, Inc.*

By /s/ Michael F. Tubach

**MICHAEL F. TUBACH
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*Attorney for Defendants
Hynix Semiconductor Inc., and
Hynix Semiconductor America Inc.*

By /s/ Craig P. Seebald

**CRAIG P. SEEBALD (pro hac vice)
McDERMOTT WILL & EMERY LLP**

*Attorney for Defendants
Renesas Technology Corp., Renesas
Technology America, Inc., Mitsubishi Electric
Corporation, and Mitsubishi Electric &
Electronics USA, Inc.*

By /s/ Paul Griffin

**PAUL GRIFFIN
WINSTON & STRAWN LLP**

*Attorney for Defendants
NEC Electronics Corporation and NEC
Electronics America, Inc. and
Liaison Counsel for Defendants*

1 I, Christopher T. Micheletti, hereby attest, pursuant to N.D. Cal. General Order No. 45, that
2 the concurrence to the filing of this document has been obtained from each signatory hereto.

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4 /s/ Christopher T. Micheletti
Christopher T. Micheletti

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6 **IT IS SO ORDERED.**

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8 Dated: March 29, 2010

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10 THE HONORABLE CLAUDIA WILKEN
11 United States District Judge
12 Northern District of California
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